

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS SCHENK TO INTERROGATORIES OF VAL-PAK DIRECT MARKETING
SYSTEMS, INC. AND VAL-PAK DEALERS' ASSOCIATION, INC.
(VP/USPS-T43-19)

The United States Postal Service hereby provides the response of witness
Schenk to the following interrogatory of Val-Pak Direct Marketing Systems, Inc. and Val-
Pak Dealers' Association, Inc.: VP/USPS-T43-19, filed on November 21, 2001.

Interrogatory VP/USPS-18 was redirected to the Postal Service.

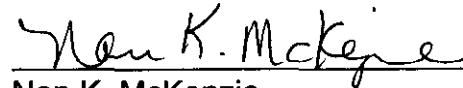
The interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Nan K. McKenzie

475 L'Enfant Plaza West, S.W.
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(202) 268-3089 Fax -5402
December 7, 2001

**RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS SCHENK TO INTERROGATORIES OF VAL-PAK DIRECT MARKETING
SYSTEMS, INC. AND VAL-PAK DEALERS' ASSOCIATION, INC.**

VP/USPS-T43-19.

Please refer to your response to MMA/USPS-T43-6(E). Is your response intended to convey that the contractually-specified route evaluation factors for rural carriers may have little relationship to the actual time or cost of performing the specified functions? Unless your answer is an unqualified affirmative, please specify contractually-specified route evaluation factors that, in your opinion, do not bear much resemblance to the actual labor required to perform the function.

RESPONSE:

No. It is not my intention to convey that there is little or no relationship between the contractually-specified route evaluation factors for rural carriers and the actual time or cost of performing the specified functions. It is my understanding that the route evaluation factors are workload measures used to determine rural carrier compensation, and as such represent rural carrier costs to the Postal Service, which are the relevant costs for my analysis.

DECLARATION

I, Leslie M. Schenk, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

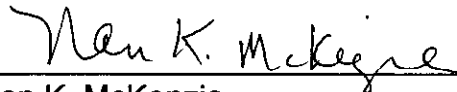


Leslie M. Schenk

Dated: 12/7/01

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.



Nan K. McKenzie

475 L'Enfant Plaza West, S.W.
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December 7, 2001